

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re:	)	Case No. 19-40883-659
	)	
PAYLESS HOLDINGS LLC, <i>et al.</i> ,	)	Chapter 11
	)	
Reorganized Debtors.	)	Jointly Administered

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Rules 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned appears as attorney for and on behalf of **Tri-Modal Distribution Services, Inc.** (a “Creditor”), and request that they be placed on the service list, and, pursuant to Bankruptcy Rule 2002, demand that all orders, pleadings, notices, motions, and other documents and papers filed in connection with this case be served upon their counsel at the office address set forth below, and that their counsel be added to the Master Service List in this case.

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This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the Creditor’s: (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in

any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Landlords are or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments expressly are hereby reserved.

Dated: March 13, 2019

By: /s/William P. Fennell  
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Attorneys for Tri-Modal Distribution Services, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of March 2019, I caused a true and correct copy of the foregoing Notice of Appearance and Demand for Service of Papers to be filed and served through ECF notification upon all parties who receive notice in this matter pursuant to the Court's ECF filing system.

/s/William P. Fennell

William P. Fennell